

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

FAIR ISAAC CORPORATION,

Court File No. 16-cv-1054 (WMW/DTS)

Plaintiff,

v.

FEDERAL INSURANCE COMPANY,
an Indiana corporation, and ACE
AMERICAN INSURANCE COMPANY,
a Pennsylvania corporation,

Defendants.

**DECLARATION OF
CHRISTOPHER D. PHAM IN
SUPPORT OF DEFENDANTS'
RESPONSE IN OPPOSITION TO
PLAINTIFF'S OBJECTION TO
ORDER GRANTING DEFENDANTS'
MOTION TO AMEND**

I, Christopher D. Pham, declare as follows:

1. I am an attorney at Fredrikson & Byron, P.A. and am one of the attorneys representing Defendants Federal Insurance Company and ACE American Insurance Company (collectively referred to herein as "Federal") in this case.

2. Attached hereto as **Exhibit 1** is a true and correct copy of excerpts from the transcript of the January 11, 2019 deposition of Henry Mirolyuz.

3. Attached hereto as **Exhibit 2** is a true and correct copy of Plaintiff Fair Isaac Corporation's Answers to Defendant's First Set of Interrogatories dated May 18, 2017.

4. Attached hereto as **Exhibit 3** is a true and correct copy of Plaintiff Fair Isaac Corporation's First Supplemental Answers to Defendant's First Set of Interrogatories dated August 16, 2017.

5. Attached hereto as **Exhibit 4** is a true and correct copy of excerpts from the transcript of the October 2, 2018 deposition of Michael Sawyer.

6. Attached hereto as **Exhibit 5** is a true and correct copy of excerpts from the transcript of the August 22, 2019 hearing before Magistrate Judge Schultz.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Dated: September 23, 2019

s/ Christopher D. Pham